

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

ERIC GILBERT,

Plaintiff,

V.

NORDSTROM, INC.; NAVY ACQUISITION CO., INC.; NORSE HOLDINGS, INC.; ERIK B. NORDSTROM; PETER E. NORDSTROM; JAMES L. DONALD; KIRSTEN A. GREEN; GLENDA G. MCNEAL; AMIE THUENER O'TOOLE; GUY B. PERSAUD; ERIC D. SPRUNK; BRADLEY D. TILDEN; MARK J. TRITTON; ATTICUS N. TYSEN; EL PUERTO DE LIVERPOOL S.A.B. DE C.V.,

## Defendants.

Case No. 25-cv-00568

**[PROPOSED] ORDER GRANTING EX  
PARTE MOTION TO EXPEDITE  
BRIEFING AND NOTATION DATE  
FOR EXPEDITED DISCOVERY  
AHEAD OF SETTING OF MERGER  
VOTE**

1       THIS MATTER came before the Court on the *ex parte* motion for Plaintiff Eric Gilbert  
 2 ("Plaintiff") for leave to expedite discovery, including briefing, on Defendants Nordstrom, Inc.,  
 3 Erik. B. Nordstrom, Peter B. Nordstrom, and El Puerto de Liverpool S.A.B. de C.V. (the  
 4 "Motion"). The Court has considered the Motion, the requests for discovery in Exhibits A-B, as  
 5 limited by the Motion (the "Discovery Requests"),<sup>1</sup> the supporting declarations, and the governing  
 6 law.  
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8       The Court finds that Plaintiff has demonstrated good cause to expedite discovery prior to  
 9 a Rule 26(f) conference. Accordingly, it is hereby ORDERED that Plaintiff's Motion is  
 10 GRANTED as follows:

- 11       • Defendants Nordstrom, Inc., Erik. B. Nordstrom, Peter B. Nordstrom, and El Puerto de  
 12           Liverpool S.A.B. de C.V ("Defendants") shall file any opposition(s) to the Motion and  
 13           Discovery Requests by Tuesday, April 8, 2025;
- 14       • Defendants shall: (a) serve responses to Interrogatories Nos. 2-3 limited to the  
 15           "September 3 Proposal" and the "Anti-Takeover Statute" topics, and (b) produce  
 16           documents responsive to Requests for Production Nos. 1-4 limited to the "September  
 17           3 Proposal" and the "Anti-Takeover Statute" topics by no later than 10 calendar days  
 18           from the date of this Order;
- 19       • Promptly upon Defendants' production of documents in accordance with the foregoing  
 20           paragraph, the parties shall submit a briefing schedule that contemplates a hearing on  
 21           Plaintiff's forthcoming motion for preliminary injunction in advance of the stockholder  
 22           meeting.
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27       <sup>1</sup> For the avoidance of doubt, the Discovery Requests include Interrogatories Nos. 2-3 and the  
 28           Requests for Production Nos. 1-4, as limited by the search terms and relevant time period as  
 described in the Motion.

1 vote on the Merger.<sup>2</sup> Defendants shall notify Plaintiff of the date of the stockholder  
2 vote as soon as practicable.

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4 Dated this \_\_\_\_ day of April 2025.

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Honorable James L. Robart  
United States District Judge

<sup>2</sup> As defined in Plaintiff's Complaint filed on March 31, 2025.